MAGELLAN MIDSTREAM PARTNERS, L.P.

Environmental Department
One Williams Center, MD 29
Tulsa, OK 74172

August 4, 2011

Mr. Nelson Smith
Superfund Division (6SF-PC)
U.S. EPA Region 6
1445 Ross Avenue
Dallas, TX 75202-2733

RE: Clean Water Act, Section 308 Information Request
Oil Spill in Galveston County, TX on or about February 24, 2011
NRC Report No: 968387

Dear Mr. Smith:

On July 8, 2011, Magellan Pipeline Company, L.P. (Magellan) received the Section 308 Information Request in regards to an oil spill in Galveston County, TX on February 24, 2011. The following is Magellan's timely response to the requested information regarding this release.

1. A report regarding the spill of unleaded gasoline into a water body, which occurred on or about February 24, 2011. (If the name of the water body is not available, use the best description available.)

On February 24, 2011, at 01:04, Magellan's Texas City to Pasadena 18" petroleum refined products pipeline incurred a rupture that resulted in a discharge of approximately 482 barrels of gasoline north of Texas City, Galveston County, TX. The flow originating from Texas City Pipeline Station was shut down within seconds after receiving the high flow/low pressure alarms. Within minutes following the shutdown, Magellan Supervisory Control an Data Acquisition (SCADA) personnel were investigating the incident, and subsequently alerted Texas City area field personnel. Magellan notified the National Response Center (NRC) at 02:26, approximately 30 minutes after analysis of pipeline SCADA data and input from field response personnel indicated a probable release. Local governmental emergency response activities were promptly initiated following notification of the Texas City Fire Department, sheriff, SERC, and LEPC at approximately 02:30. The release site was confirmed and physically identified at 02:49 and release mitigation and containment activities were initiated thereafter to isolate and secure the area around the release site, including closing of the isolation valve closest to the release site, deploying boom, and closing of flood gates to prevent migration of product into Moses Lake. Additional activities of establishing air monitoring points, notification of public in proximity to the release site, and closing of adjacent roads and railways were implemented as precautions.

The release entered a small drainage channel east of the pipeline right-or-way and then travelled approximately 500 feet within the drainage channel until entering Bayou Pierre north of the release point. The released product was contained within an approximate 4,500 feet section of Bayou Pierre.

The Texas City Fire Department installed booms downstream where Bayou Pierre intersects 25th Avenue North in Texas City. The 25th Avenue Bridge was the maximum down gradient extent of the released product. Magellan response personnel placed containment and absorbent boom to further contain the affected area. Magellan's OSRO initiated recovery of the product by vacuum truck beginning at approximately 04:20. Containment and absorbent booms were maintained within Bayou Pierre until the pipeline repairs were completed and approval obtained from the TCEQ to remove the boom from Bayou Pierre.

Surface water and sediment samples were obtained from Bayou Pierre to determine any effect upon the bayou. Based on analytical data and visual observations, no long-term ecological impacts have occurred in Bayou Pierre. Additionally, Texas Park and Wildlife Department performed an on-site assessment on February 25, 2011 and they did not identify any threatened or endangered species that were impacted by the incident.

2. The amount of product spilled (in either barrels or gallons). For releases of mixtures, include the total volume and either volumes or relative percentages of each component. If any reported value is an estimate, describe the method used to develop the estimate.

Magellan estimated that 482 barrels of gasoline were released from the pipeline, based upon SCADA metering, pressure data, and the repacking volumes.

3. Duration of the spill event. Report the time and date the spill began, how long the product remained in the watercourse, as well as on the shoreline or banks and when the cleanup operations were considered complete and all product removed from waters of the United States and adjoining shoreline.

The affected pipeline operation automatically shut down immediately following the rupture at approximately 01:04 on February 24, 2011. Due to the pipeline elevation at the rupture site relative to the overall pipeline segment, along with the physical top of the pipe breach, Magellan estimates that the duration of gasoline flow from the pipeline ranged from 5 to 30 minutes.

Emergency responders commenced boom deployment along the unnamed drainage channel and along portions of Bayou Pierre between 03:00 and 04:00 on February 24, 2011. The Magellan contract OSRO, Garner Environmental, also utilized vacuum trucks to remove the product from the unnamed drainage ditch. Garner Environmental completed all watercourse and bank cleanup activities the evening of February 24, 2011. All gasoline was removed from the watercourse and bank within 24 hours of the release.

4. The cause of the spill.

Based on the metallurgical analysis of the failed section of pipe, it was determined that the pipe contained an original manufacturing seam defect that existed from 1962, when the pipeline was constructed, and placed into service until its subject failure. The original manufacturing defect ultimately propagated a crack that resulted in an in-service rupture. In 2010, the pipeline had been inspected for corrosion and seam defects, which did not reveal any signals or indications of this defect.

5. Name of the immediate receiving ditch, creek, stream, river, lake, arroyo, swale, etc. if known.

The receiving body of water was an unnamed drainage channel.

A. Also include the names of all downstream receiving waters that the spill affected.

Bayou Pierre is the only named receiving water that the spill affected. An unnamed tributary of Bayou Pierre was also affected.

B. Additionally, list all downstream receiving water bodies to the first major river or lake, regardless of whether or not the spill affected the water bodies.

Downstream of Bayou Pierre is Moses Lake which ultimately flows into Galveston Bay. Based on sampling and observational data, there was no evidence throughout the course of the event of gasoline reaching Moses Lake.

6. Site location map.

Attachment A, Figure 1 contains a Site Location Map.

7. Drawing of the site showing locations of the facilities.

Attachment A, Figure 2 contains a Site Overview, Boom Placement and Sampling Locations.

8. Sketch of the spill site showing extent of the spill.

Attachment A, Figure 2 contains the extent of the spill and boom deployment areas and Figure 3 contains a depiction of the immediate release impacted area in addition to initial soil sampling assessment locations.

9. Photographs of the spill and the spill site both before and after cleanup.

Attachment B contains photographs of the spill site before and after cleanup.

10. Documentation of any penalties assessed by local, state or federal agencies.

No penalties have been assessed by local, state or federal agencies.

11. State the owner and operator of the equipment or facility from which the spill originated.

Magellan Pipeline Company, L.P. purchased the Texas City to Pasadena Pipeline in September 2010.

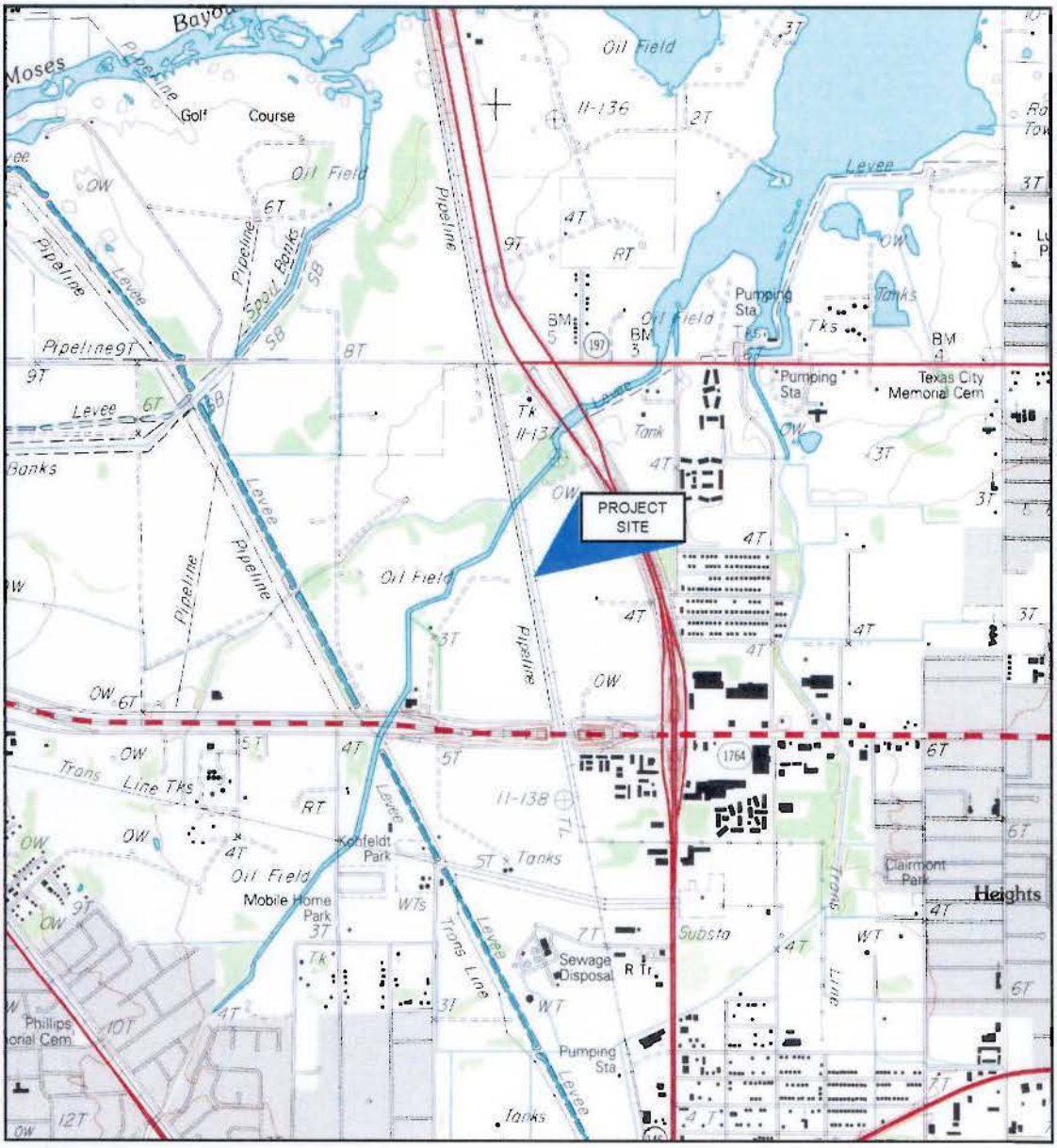
If you have any additional questions regarding the information provided, please contact Rick Fahrenkrog at (918) 574-7480.

Sincerely,
Magellan Pipeline Company, L.P.

Rick Fahrenkrog
Director of Environmental, Health, Safety, and Security
Magellan Midstream Partners, L.P.

Attachments: As Stated

Attachment A
Site Figures



SOURCE: USGS 7.5 MINUTE QUAD
"TEXAS CITY, TEXAS" DATED 1994

figure 1

SITE LOCATION MAP
PIERRE BAYOU RELEASE
TEXAS CITY, TEXAS
Magellan Midstream Partners, L.P.

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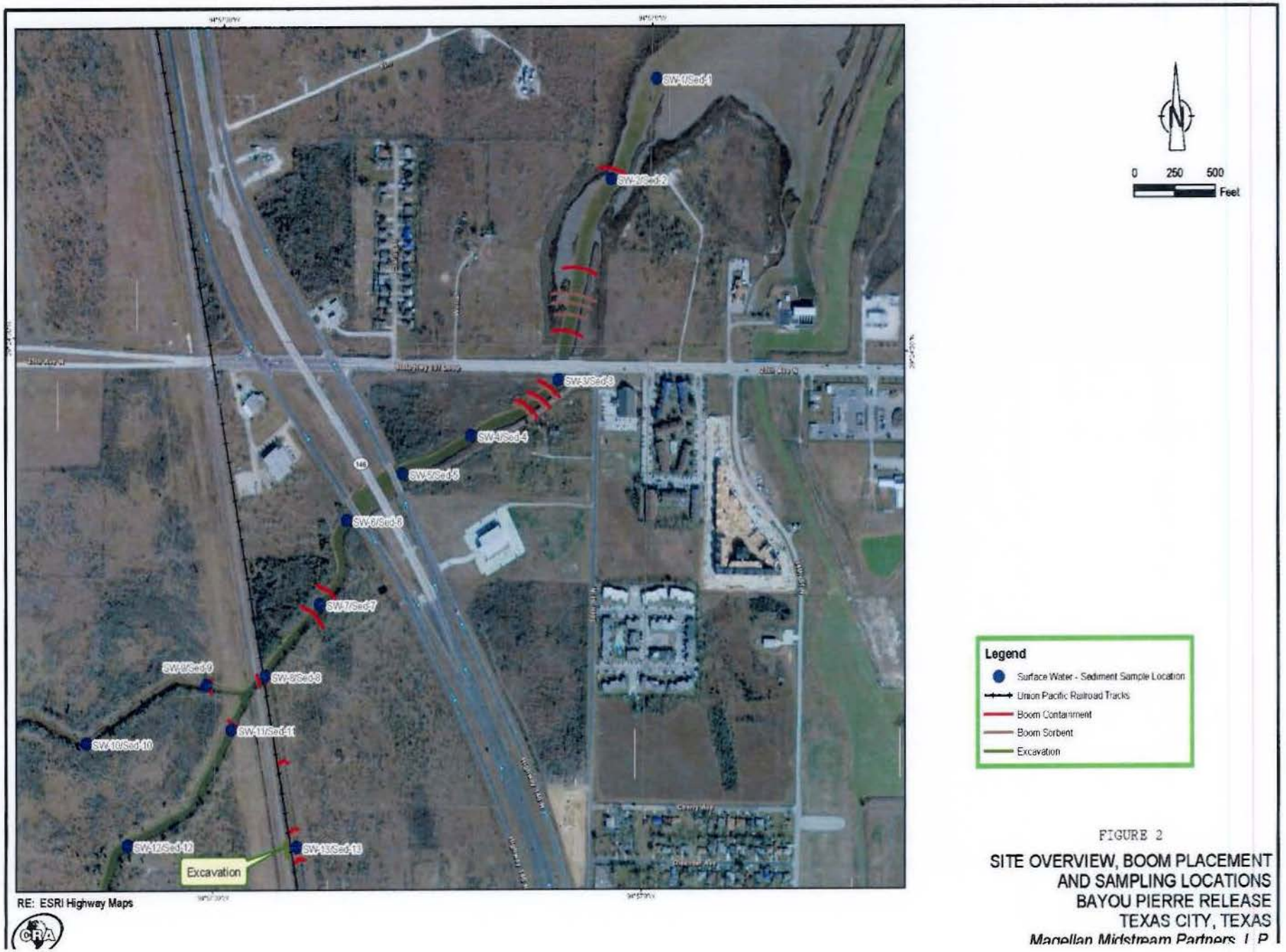

RE: ESRI Highway Maps

FIGURE 2

SITE OVERVIEW, BOOM PLACEMENT AND SAMPLING LOCATIONS
BAYOU PIERRE RELEASE
TEXAS CITY, TEXAS
Magellan Midstream Partners, L.P.

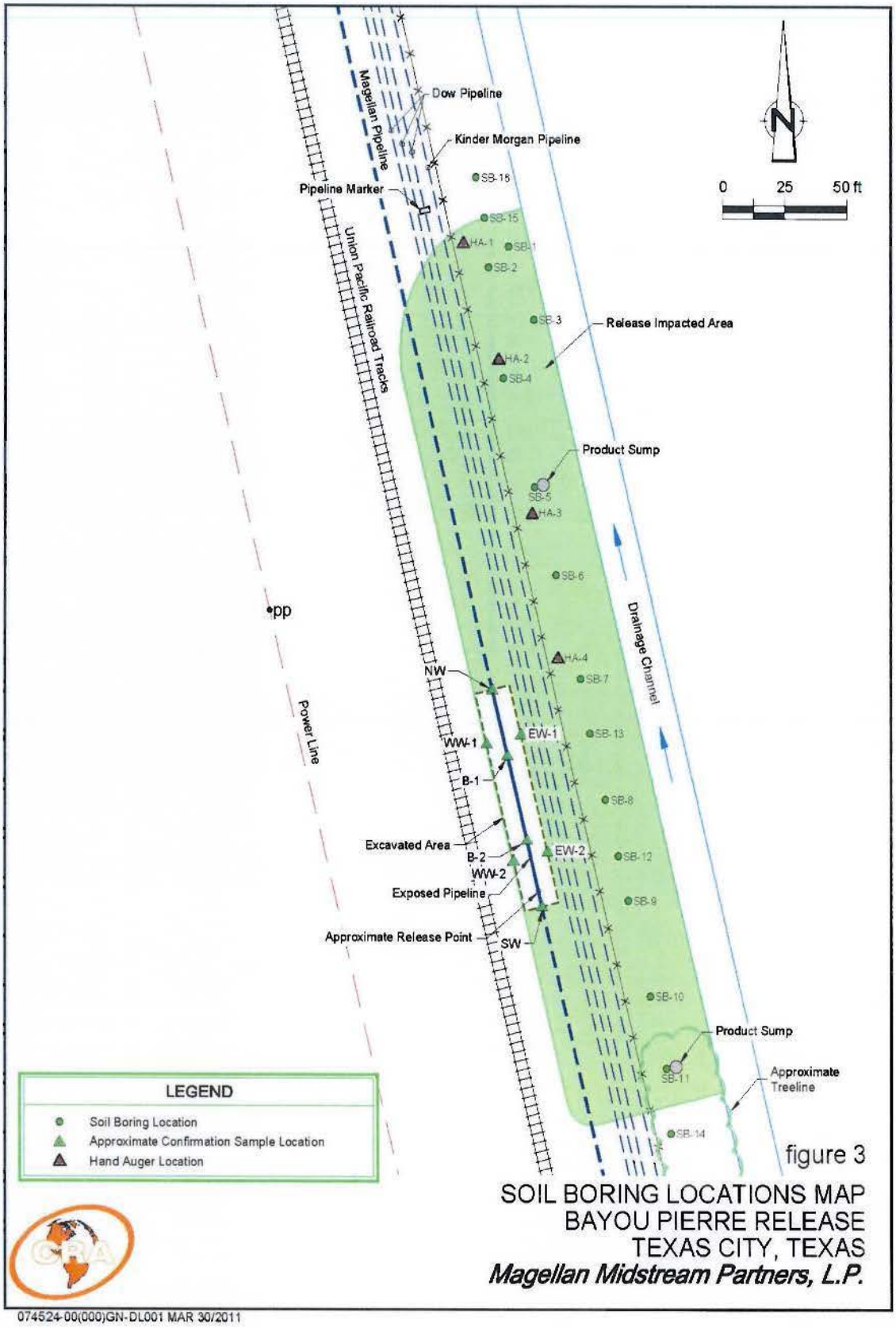

figure 3

SOIL BORING LOCATIONS MAP
BAYOU PIERRE RELEASE
TEXAS CITY, TEXAS
Magellan Midstream Partners, L.P.

074524-00(000)GN-DL001 MAR 30/2011

Attachment B
Site Photographs

View to South – Unnamed Drainage Channel from underflow dam location

View to North – Spill Site Prior to Cleanup

View to North – Spill Site after Cleanup